

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WILLIE E. TATE, SR.,

Plaintiff,

vs.

HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY; et al.

Defendants.

C.A. NO. 04-103E

(THE HONORABLE MAURICE B. COHILL, JR.)

JOINT MOTION FOR AN EXTENSION OF TIME

Plaintiff Willie E. Tate, Sr. ("Plaintiff") and Defendants Hartford Life and Accident Insurance Company and Group Long Term Disability Benefits for Employees of Morris Coupling Company ("Defendants"), hereby file this Joint Motion for an Extension of Time, and in support thereof, offer the following:

1. On June 20, 2005, this Court issued a Case Management Order in this matter.
2. Pursuant to that Order, discovery was set to close on September 1, 2005, and the deadline for the filing of motions was set for September 15, 2005.
3. The parties are seeking an extension of time for both the discovery and motion deadlines because the parties would like to attempt to settle this matter before incurring the costs associated with these deadlines.
4. Accordingly, the parties respectfully request that this Court extend the deadlines set forth in the June 20, 2005 Case Management Order as proposed by the attached Order.

5. By granting this Joint Motion for Extension of Time, no parties will be prejudiced.

WHEREFORE, Plaintiff Willie E. Tate, Sr. and Defendants Hartford Life and Accident Insurance Company and Group Long Term Disability Benefits for Employees of Morris Coupling Company respectfully request that this Joint Motion for an Extension of Time be granted.

Dated: September 15, 2005



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